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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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KRISTOFER CHAMBERS,

Civil Action No. 19-CV-158

Plaintiff,

— against —

COUNTY OF NASSAU, NASSAU COUNTY
POLICE DEPARTMENT; Police Officer
MICHAEL SCHMIDT; Police Officer
OMAR GALAN; Police Officer JOSEPH
GIACONE; Police Officer MIKE
KAMPERVEEN; and POLICE OFFICERS
JANE AND JOHN “DOES” individually and in their
official capacities (said names being fictitious and
meaning to represent police officers whose names and
true identities are currently unknown to plaintiff),

**DECLARATION IN
OPPOSITION TO
DEFENDANTS’ MOTION
TO DISMISS PURSUANT TO
FED. R. CIV. PRO. 12(b)(6)**

Defendants,
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EUGENE KRONER, declares pursuant to 28 U.S.C. § 1476, and subject to the penalties of perjury the following:

1. I am an attorney with the Law Offices of Vincent S. Wong, and we are the attorneys for the Plaintiff in this action. I am fully familiar with the facts and circumstances of this matter.

2. I make this declaration in opposition to Defendants’ Motion to Dismiss pursuant to Fed. R. Civ. Pro. 12(b)(6).

3. A true and correct copy of the Plaintiff's Memorandum of Law In Opposition to Defendants' Motion To Dismiss Pursuant to Fed. R. Civ. Pro. 12(b)(6) is attached hereto as **Memorandum of Law**.

4. A true and correct copy of the certified Certificate of Disposition is attached hereto as **Exhibit 1**.


5. A true and correct copy of the Complaint filed on January 8, 2019 is attached hereto as **Exhibit 2**.

WHEREFORE, Plaintiff respectfully requests an Order denying Defendants' Motion to Dismiss in its entirety, and for such other and further relief as this Court deems just, proper, and equitable.

Dated: July 25, 2019
New York, New York

Respectfully submitted,

LAW OFFICES OF VINCENT S. WONG

By: /s/ Eugene Kroner 
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